

EXHIBIT 2

FAX

**Fort Meigs Wellness
and Behavioral
Health**

975 Commerce Drive
Perrysburg OH 43551
Tel: 419-874-8257
Fax: 419-873-7584

| | |
|---------------------------------|---------------------------------|
| To: <i>Katherine Swift</i> | From: <i>Richard Hoernemann</i> |
| Company: <i>BaxterBuck, LLP</i> | Ref. No. |
| Fax: <i>(312) 494-4440</i> | Pages: <i>4 (incl. cover)</i> |
| Tel: | Date: <i>10/14/19</i> |
| Subject: <i>Deborah Bish</i> | |

☐ Urgent☐ Please Reply☐ Please Comment☐ For Your Info☐ Please Recycle

Comments:

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CONSENT FOR RELEASE OF INFORMATION

CLIENT NAME: Deborah A. BirchDATE OF BIRTH: 1/25/54SOCIAL SECURITY #: [REDACTED]

In accordance with Federal Regulation 42 CFR, Part 2, I hereby authorize:

Fort Meigs Wellness & Behavioral
975 Commerce Drive
Perrysburg OH 43551
419-874-8257
Fax: 419-873-7584

To release
to and/or
share with

Barthel Beck, LLP
54 W. Hubbard St.
Chicago, IL 60654
Phone: _____
Fax: _____

The following information:

10/11/19 letter from Michigan Medicine Thoracic Surgery Clinic,
reason for contact, medical status as it pertains to requested
participation in upcoming trial

The purpose of this disclosure:

to provide documentation of medical condition, mental status

(Including psychological records related to emotional illness, and information regulated by Federal Public Law 93-282, confidentiality of alcohol and drug abuse patients. Also included are records documenting the diagnosis and treatment of AIDS, ARC, HIV positivity and other related diseases)

AS REQUIRED BY SECTION 2:32 (2) PROHIBITION OF REDISCLOSURE RULES: This information has been disclosed to you from records whose confidentiality is protected by Federal Law. Federal regulations prohibit you from making any further disclosure of it without specific written consent of the person to whom it pertains, or as otherwise permitted by such regulations. A general authorization for the release of medical or other information is NOT sufficient for this purpose.

This consent, unless revoked earlier, expires: 12/31/19
(date, event, condition, or within 180 days: Ohio Rev. cod #3701.74)

Condition, date or event of earlier expiration: _____

I also understand that this release can be revoked by me at any time, and that the revocation must be signed and dated by me. Upon revocation of consent, further release of information shall cease immediately.

10-14-19

Date:

Signature:

Witness:

Relationship:

I hereby revoke my consent for the release of the above information.

Date:

Signature:

Witness:

Relationship:

FORT MEIGS WELLNESS & BEHAVIORAL HEALTH

975 COMMERCE DRIVE, PERRYSBURG, OH 43551

(419) 874-8257- VOICE - (419) 873-7584 - FAX

10/14/19

Katherine Swift
BartlitBeck, LLP
Courthouse Place
54 W. Hubbard Street
Suite 300
Chicago, IL 60654

CONFIDENTIAL

Re: Deborah A. Bish
dob: 1/28/54

Dear Ms. Swift:

Accompanying please find a letter from Kathryn Castorena, a nurse practitioner under Kiran Lagisetty, M.D., who performed thoracotomy and lobectomy procedures on Ms. Bish on 2/19/19, documenting her post-operative complications.

As you know, Ms. Bish has been subpoenaed to provide testimony in a suit against her employer, Walgreens, relative to its role in the distribution of opioid medications. Her deposition in this matter predated her surgery, reportedly enduring eight hours. She found this to be extremely stressful, thus given the change in her medical status, she doubts that she will again be able to endure the expected day-long questioning without experiencing pain. Thus, she is requesting to be excused on medical grounds from providing testimony in this trial.

I trust this information may suffice yet I remain available if I can be of further assistance in this case.

Sincerely,



Richard Hoernemann, LPC
Counselor

10/11/2019 2:48:44 PM

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Michigan Medicine Thoracic Surgery Clinic |
Taubman Center
Floor 2 Reception C
1500 E Medical Center Dr Spc 5344
Ann Arbor MI 48109-5344
Telephone: 734-936-5738
Fax: 734-615-2656

MICHIGAN MEDICINE
UNIVERSITY OF MICHIGAN

Rick Hoernemann
975 Commerce Drive
Perrysburg OH 43551

Patient name: Deborah Bish
Date of birth: 1/28/1954

Dear Mr. Hoernemann:

Ms. Deborah Bish is a 65 y.o. woman with history of ocular histoplasmosis and confluent consolidation within the superior segment of the left lower lobe, focal bronchiectasis and bronchial lithiasis, which was symptomatic with recurrent large volume hemoptysis despite two prior IR embolizations. On 2/19/2019 she underwent a left thoracoscopic converted to open left thoracotomy for lower lobectomy. She was able to be discharged home on 2/25/2019. Her postoperative recovery has been complicated by intercostal neuralgia and post-thoracotomy pain syndrome. She experiences worsening of her symptoms with increased stress and poor sleep. Her pain is being treated with gabapentin three times daily, although she continues to have limitations due to pain.

I hope this summary provides you the assistance you need.

Please contact our office should you have any questions.

Sincerely,

Kathryn Mari Castorena, NP

CC:
Deborah A. Bish